

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

TREVOR KEVIN BAYLIS,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

No. 2:23-cv-01653-RSM

**DECLARATION OF JONAH O.
HARRISON IN SUPPORT OF
MOTION TO REFER
COPYRIGHT REGISTRATION
QUESTIONS TO THE
REGISTER OF COPYRIGHTS
AND FOR STAY OF
PROCEEDINGS**

I, Jonah O. Harrison, declare as follows:

1. I am an attorney at the law firm Arete Law Group PLLC. I represent Defendant Valve Corporation (“Valve”) in this matter. I am over the age of eighteen and have personal knowledge of the facts stated below. I am otherwise competent to testify and, if called upon to testify on the matters herein, would do so consistently with this declaration.

2. Attached hereto as **Exhibit A** is a true and correct copy of the certificate of copyright registration dated August 11, 2023 from the United States Copyright Office.

3. Attached hereto as **Exhibit B** is a true and correct copy of the documents Trevor Baylis deposited with his application for copyright registration with the U.S. Copyright office. My office received these documents in response to our request for the registration deposit file from the Copyright Office. In addition to these documents, the

1 deposit file contains a video clip of the entire Iron Sky movie. Valve can produce that upon
2 request should the Court request it, but due in part to its size, Valve has not attached it to this
3 declaration and motion.

4 4. Attached hereto as **Exhibit C** is a true and correct copy of Valve's request for
5 a certified copy of the entire registration deposit file. In response to Valve's request for a
6 certified copy of the entire registration file, the Copyright Office did not produce a completed
7 version of the copyright application.

8 5. Attached hereto as **Exhibit D** is a true and correct copy of a certified
9 translation of the Finnish court's decision (attached thereto) regarding Baylis' claim of
10 alleged copyright ownership of the film Iron Sky in that court labeled Bates Nos.
11 VALVE_001-003. In addition, appended to the certified translation is an unredacted copy of
12 the court's decision showing the names of the litigants rather than letters.

13 6. Attached hereto as **Exhibit E** is a true and correct copy of the Supreme Court's
14 decision to uphold the trial court judgment in full. I inserted the language of Exhibit E into
15 Google Translate and several other online translation services, all of which confirm that the
16 language of the order is that "leave to appeal is not granted, and the judgment of the market
17 court will therefore remain permanent."

18 7. Attached hereto as **Exhibit F** is a true and correct copy of the May 23, 2008
19 copyright registration held by *Iron Sky* screenplay author, Johana Sinislao.

20 8. Attached hereto as **Exhibit G** is a true and correct copy of the story produced
21 by a Hollywood Reporter excerpting the result of the Finnish court case.

22 9. Attached hereto as **Exhibit H** is a true and correct copy of Trevor Baylis'
23 comments posted on March 1, 2019.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of Trevor Baylis'
25 comments complaining about the Finnish judgment at the time he received his 2023 copyright
26 registration.

1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

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4 Executed in Seattle, Washington on this 3rd day of April, 2024.

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6 /s/ Jonah O. Harrison

7 Jonah O. Harrison
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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused true and correct copies of the foregoing document to be served upon the following, at the addresses stated below, via the method of service indicated.

Trevor Kevin Baylis (*pro se*)
Jankanraitti 10 A 4
33560, Tampere
Finland

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E-mail
U.S. Mail
E-filing

Dated this 3rd day of April, 2024 in Seattle, Washington.

/s/ Kaila Greenberg
Kaila Greenberg
Legal Assistant